

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

G.W.,

Plaintiff,

v.

NORTHBROOK INDUSTRIES,  
INC., d/b/a UNITED INN AND  
SUITES,

Defendant.

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Civil Action No.  
1:20-cv-05232-JPB

**DEFENDANT NORTHBROOK INDUSTRIES, INC. d/b/a UNITED INN  
AND SUITES' CONSENT MOTION TO EXTEND THE DEADLINE TO  
FILE A SUPPLEMENTAL BRIEF IN SUPPORT OF ITS RESPONSE IN  
OPPOSITION TO PLAINTIFF'S MOTION FOR SANCTIONS OR  
RESPONSE TO PLAINTIFF'S MOTION FOR RECONSIDERATION**

COMES NOW Defendant Northbrook Industries, Inc. d/b/a United Inn and Suites ("Defendant"), and hereby moves, with the consent of Plaintiff G.W., for an extension of time for Defendant to file either a Supplemental Brief in Support of its Response in Opposition to Plaintiff's Motion for Sanctions or Response to Plaintiff's Motion for Reconsideration through and including December 5, 2024, showing this Honorable Court as follows:

1.

On August 7, 2024, Defendant filed a Motion for Leave to File Supplemental Brief in Support of Response in Opposition to Plaintiff's Motion for Sanctions or in

the Alternative, Motion for Leave to File Response to Plaintiff's Motion for Reconsideration (Defendant's "Motion"). Doc. 154.

2.

On November 14, 2024, this Court issued an Order granting Defendant's Motion and providing Defendant's two weeks from the entry of the Order to file either a Supplemental Brief in Support of its Response in Opposition to Plaintiff's Motion for Sanctions or Response to Plaintiff's Motion for Reconsideration. Doc. 157.

3.

Due to the timing of the Court's Order, the current deadline falls on Thanksgiving Day. In light of this fact, Plaintiff has agreed to an extension of the November 28, 2024, deadline, through and including December 5, 2024. Thus, Defendant respectfully requests that this Court grant the agreed upon extension.

4.

A proposed Order is attached hereto as **Exhibit A**.

*Signatures follow on next page.*

Respectfully submitted this 26th day of November, 2024.

**/s/ David Bouchard (by Cameron A. Mobley with express permission)**

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**RULE 7.1D CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1D of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14 point size.

Dated: November 26, 2024.

/s/ Cameron A. Mobley

Cameron A. Mobley

Georgia Bar No. 613048

**CERTIFICATE OF SERVICE**

I hereby certify that on November 26, 2024, I electronically filed the foregoing ***DEFENDANT NORTHBROOK INDUSTRIES d/b/a UNITED INN AND SUITES' CONSENT MOTION TO EXTEND THE DEADLINE TO FILE A SUPPLEMENTAL BRIEF IN SUPPORT OF ITS RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR SANCTIONS OR RESPONSE TO PLAINTIFF'S MOTION FOR RECONSIDERATION*** with the Clerk of Court using the CM/ECF filing system which will automatically send e-mail notification of such filing to the following counsel of record:

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